

EXHIBIT 8

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC

Plaintiff,

vs.

Case No. 17-cv-00939-WHA

UBER TECHNOLOGIES, INC.;

OTTOMOTTO, LLC; OTTO

TRUCKING LLC,

Defendants.

VIDEO DEPOSITION OF EMIL MICHAEL
San Francisco, California
Friday, July 28, 2017
Volume I

REPORTED BY:

REBECCA L. ROMANO, RPR, CSR No. 12546

JOB NO. 2666869

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VIDEO DEPOSITION OF EMIL MICHAEL, taken
on behalf of the Plaintiffs, at Quinn Emanuel
Urquhart & Sullivan, LLP, 50 California Street,
22nd Floor, San Francisco, California, commencing
at 9:20 Friday, July 28, 2017 before
Rebecca L. Romano, Certified Shorthand
Reporter No. 12546

1 be the case? 11:46:56

2 A. It's a small industry, and experts that
3 you get can help you accelerate your timeframes.
4 It's very common in tech.

5 Q. If you look at the last sentence, it 11:47:21
6 says, "This is a team that knows each other, knows
7 the tech, knows the potholes and can jam at an
8 incredible rate. We hope to help solve some of our
9 most pressing challenges."

10 Do you see that? 11:47:46

11 A. I do.

12 Q. The -- when it says "knows the tech," at
13 least to the extent that -- that there were people
14 coming from Waymo, they knew Waymo's tech, right?

15 MS. RAY: Objection. Form. 11:48:14

16 MR. LIN: Objection.

17 THE DEPONENT: The way I read that is,
18 they know the tech of autonomous vehicles and
19 what's happening in the world, and -- and the
20 robotics. 11:48:24

21 Q. (By Mr. Perlson) And at least some of
22 the tech that they would know necessarily would be
23 tech learned at -- working on this at Waymo.

24 I mean, doesn't that make common sense?

25 MS. RAY: Objection to form. 11:48:40

1 MR. LIN: Objection. 11:48:41

2 THE DEPONENT: I think that's -- you

3 know, we all take with us what we learn at the

4 companies we work at, so...

5 Q. (By Mr. Perlson) And it says "Knows -- 11:48:51

6 knows the potholes."

7 What does that refer to?

8 MS. RAY: Objection. Form.

9 THE DEPONENT: That means knows the

10 dead ends, the technical -- the things that are 11:49:04

11 technically possible.

12 Q. (By Mr. Perlson) And that was a value to

13 Uber, as well?

14 A. Yeah, knowing not -- where to not spend

15 resources is valuable to any tech company. 11:49:26

16 Q. You need to take a break?

17 A. I don't need to unless -- you were taking

18 your mic off, so I assume you were asking for a

19 break.

20 (Exhibit 398 was marked for 11:50:33

21 identification by the court reporter and is

22 attached hereto.)

23 Q. (By Mr. Perlson) You have been handed

24 what's been marked as Exhibit 398, Uber 60664. And

25 it's an email from Mr. Poetzscher to yourself and 11:52:04